

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ESHA RESEARCH, LLC, now known as )  
TRUSTWELL, )  
Plaintiff, )  
v. ) Case No. 1:25-cv-00206-RGA  
RLH ASSETS, LLC d/b/a FOODWIT; and )  
DOES 1-20, ) JURY TRIAL DEMANDED  
Defendants. )

**DECLARATION OF MATTHEW S. WARREN IN SUPPORT OF  
DEFENDANT'S MOTION TO DISMISS OR TRANSFER  
UNDER 28 U.S.C. § 1406 OR TO TRANSFER UNDER 28 U.S.C. § 1404**

I, Matthew S. Warren, declare under 28 U.S.C. § 1746:

1. I am an attorney licensed to practice in the State of California and seeking admission *pro hac vice* to this Court in this action. I am a partner at Warren Kash Warren LLP, counsel for defendant RLH Assets, LLC in this action. I have personal knowledge of the matters set forth herein and, if called as a witness, could and would testify competently thereto.

2. Attached to the concurrently filed Declaration of Becki Holmes is Exhibit 9.

Pages 3-21 of the PDF of that exhibit comprise a draft complaint.

3. Attached hereto as Exhibit 1 is a true and correct copy of a redline comparison document between the complaint filed in this action, D.I. 1, and the draft complaint on pages 3-21 of the PDF of Exhibit 9 to Ms. Holmes' declaration.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 22, 2025.



Matthew S. Warren